

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

DORIS ANN SCOTT and ORIEL MOORE,)
)
 Plaintiffs,)
)
 v.)
)
CENTURION OF MISSOURI, LLC, et al.,)
)
 Defendants.)

Case No. 2:24-CV-04107-MDH

AFFIDAVIT

Benjamin Stelter-Embry, being of lawful age and duly sworn on oath, makes this affidavit based on his personal knowledge, and states the following is true and correct to the best of his knowledge and belief:

1. I am an attorney of record for Plaintiffs Doris Ann Scott and Oriel Moore in the above-captioned matter.

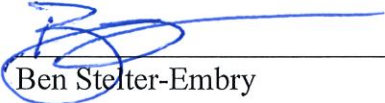
2. I have obtained the written opinion of a legally qualified healthcare provider which states that Jennifer Long, APRN, and Centurion of Missouri, LLC, failed to use such care as a reasonably prudent and careful healthcare provider would have under similar circumstances for the care received by decedent, Othel Moore, Jr.

3. I have obtained the written opinion of a legally qualified healthcare provider which states that such failure to use such reasonable care directly caused or directly contributed to the death of Othel Moore, Jr.

4. The legally qualified healthcare provider offering such an opinion is Timothy E. Hughes, M.D, FACS, 19445 Lonnie Walker Road, Citronelle, AL 36522. Dr. Bailey is a medical doctor and is board certified in Obstetrics and Gynecology. Dr. Hughes is the former Chief Medical

Officer for Armor Correctional Health, former Regional Medical Director for Corizon Health and currently serves as a surgeon for Mobile County Sherriff's Office and Medical Officer for the United States Marshals Service, Gulf Coast Regional Fugitive Task Force. Dr. Hughes is licensed to practice medicine in Alabama and currently maintains his practice in Alabama.

FURTHER AFFIANT SAITH NOT.


Ben Stelter-Embry

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

The foregoing was signed before me on this 22nd day of April, 2025.


Selena Andrade

Notary Public

My Commission Expires: 4/17/2027

